



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 Chestnut Building
Philadelphia, Pennsylvania 19107-4431

30514

Mr. Stephen Brand
CH2M Hill
P.O. Box 4400
Reston, VA 22090-1483

JUL 1 1994

Re: North Penn Area 12 Site
Worcester Township, PA
Sampling & Analysis Plan Comments

Dear Mr. Brand:

Please find listed below my comments on the draft sampling and analysis plan (SAP) that you submitted to EPA in May 1994. Also, enclosed with this letter are comments from other EPA technical reviewers. Comments from the PA Department of Environmental Resources will be forwarded to you as soon as they are received.

Comments on the QAPjP -

1. Table 2-2 contains the first reference to SAS in the document. Since the SAS process will no longer exist after June 30, 1994, all discussions concerning procuring analytical services in the SAP must be revised to reflect the most current process for procurement of analytical services. Delivery of Analytical Services (DAS) is the latest process for procuring analytical services. RAS, DAS, and subcontracting options should all be included in the discussion of analytical options. Attach is a flow chart and some fact sheets which provide some information on the DAS process.
2. Page 2-7, first paragraph; it is stated that an estimated two soil samples per soil boring will be analyzed. The criteria that will be used for selecting which samples will be analyzed at the onsite laboratory should be discussed and defined. I would also be interested in what it would cost to analyze all soil boring samples at the onsite lab and eliminating the screening process. This approach was used very successfully at the North Penn Area 6 site.
3. Page 3-1, first paragraph; it is stated that all analysis will take place through a CLP laboratory. This will not be the case. First of all there will be an onsite lab used for analyzing the majority of the samples; and secondly, Hill may have to subcontract directly for analytical work if the cost will be greater than \$25,000 and the analysis is not

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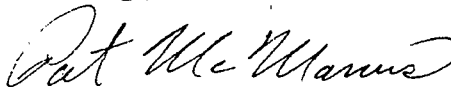
available through RAS.

Comments on the FSP -

1. Page 2-6, fourth paragraph; see comment 2. on the QAPjP above.
2. Page 2-16 and 2-17; There are a number of questions and inconsistencies in the discussion in Section 2.6 RI-Derived Waste Disposal:
 - a. The first sentence states that RI-derived waste will be stored in a centralized location, yet later its stated that all water will be drummed and stored at the well head.
 - b. Under the **Location** discussion it is stated that soil cuttings from MW-12 will be place in drums prior to removal by a subcontractor. What type of disposal method will be required?
 - c. Under the **Methods** discussion it is unclear what will be sampled one of every ten drums. Will this be done for each type waste or just the soil cuttings from MW-12?
 - d. It is stated that no waste characterization beyond that already available will be needed to obtain approval for treatment and disposal. Sampling will be needed to verify that discharge requirements of the temporary permit are met, however.

Please address these comments in your preparation of the final SAP which is requested for submittal by July 18, 1994. If you would like to discuss any of the comments further, please call me at (215) 597-8257.

Sincerely,



Patrick McManus
Remedial Project Manager

enclosures

cc: Martin Kotsch, 3HW43
Jim Clark, 3PM73

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